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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN RE:**

**NATIONAL RIFLE ASSOCIATION OF  
AMERICA and SEA GIRT LLC,**

**DEBTORS<sup>1</sup>**

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**CHAPTER 11**

**CASE NO. 21-30085-hdh11**

**Jointly Administered**

**DEBTORS' OBJECTIONS TO ACKERMAN MCQUEEN, INC.'S  
DEPOSITION DESIGNATIONS AND COUNTER-DESIGNATIONS THERETO**

The National Rifle Association of America ("NRA") and Sea Girt LLC ("Sea Girt" and together with NRA, the "**Debtors**"), debtors and debtors-in-possession, by and through their counsel, submit the following Objections and Counter-Designations to the Ackerman McQueen, Inc.'s ("**AMc**") Deposition Designations.

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<sup>1</sup> The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt).

### **GENERAL OBJECTIONS**

The Debtors object to the designations of any portion of the transcripts of Daniel Boren, Millie Hallow, Carolyn Meadows, Oliver North, and Steve Hart for those reasons asserted in the *Debtors' Objections to Deposition Testimony from Prior Unrelated Cases and for Which Witnesses are Not Unavailable and Request to Exclude the Same* [ECF No. 494] ("Motion to Exclude") which arguments are incorporated herein as if fully set forth herein. The objections and counter-designations are therefore applicable only to the extent that the Motion to Exclude is overruled or the objections stated herein are otherwise overruled.

The Debtors further reserve their right to raise objections to testimony as it is read into the record or played live at the hearing in this matter.

Furthermore, the designations included testimony that may be cited as confidential and therefore, upon the Court's ruling on objections and testimony being submitted for the record, certain information may need to be sealed as appropriate.

Finally, the designating party has not indicated an intent to introduce any exhibits through these designations and Debtors reserves their rights to object if, and when, the designating party moves for the admission of any exhibits into evidence.

Debtors reserve the right to amend or supplement these objections and counter-designations.

### **SPECIFIC OBJECTIONS**

*Deposition of Daniel Boren, taken November 30, 2020*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on all parties receiving notice by and through the Court's CM/ECF system on April 7, 2021.

/s/ Caitlin Halm

Caitlin Halm, an employee of  
Garman Turner Gordon LLP